

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DENNIS DIMON,

Plaintiff,

VS.

C. A. No: 05-11073 REK

**METROPOLITAN LIFE
INSURANCE COMPANY, KEMPER
INSURANCE COMPANY,
MORGAN STANLEY DW, INC.,
MICHAEL B. LATTI, LATTI
ASSOCIATES, and LATTI &
ANDERSON LLP,**

Defendants.

UNOPPOSED MOTION TO EXTEND PRETRIAL DEADLINES

Plaintiff Dennis Dimon, as well as defendants Metropolitan Life Insurance Company, Morgan Stanley, DW, Inc., Michael B. Latti, Latti Associates and Latti & Anderson (hereinafter collectively the “Moving Parties”), request the Court extend the pretrial deadlines as set forth below. Kemper Insurance Company (hereinafter “Kemper”) will not join in this motion, but has represented to the undersigned that it will not oppose the motion.

As grounds for this Motion, the Moving Parties represent that they have made good faith efforts to comply with the Court's pretrial deadline regarding non-expert discovery, which is currently set for May 15, 2006. The Moving Parties have agreed to extend the non-expert deposition deadline until June 15, 2006, but only for the limited

purpose of taking those depositions that were noticed prior to May 15, 2006 and for no other purpose. Kemper, while not agreeing, has represented that they will not oppose the requested extension.

If allowed by the Court, this Motion necessitates extending the remaining pre-trial deadlines as follows:

1. All non-expert discovery shall be completed by May 15, 2006, except that depositions noticed prior to May 15, 2006 shall be completed by June 15, 2006.
2. Plaintiff shall designate trial experts and shall disclose the information contemplated by Fed. R. Civ. P. 26(a)(2)(b) by July 15, 2006.
3. Defendants shall designate trial experts and shall disclose the information contemplated by Fed. R. Civ. P. 26(a)(2)(b) by September 1, 2006.
4. All expert depositions to be completed by October 15, 2006.
5. All dispositive motions, and/or motions for summary judgment, are to be filed by December 15, 2006.
7. All oppositions to dispositive motions, and/or motions for summary judgment, are to be filed by January 15, 2005.
8. A final pretrial conference will be held on or about February 28, 2007 at 2:00 p.m.

Respectfully submitted,
For the defendant,
Metropolitan Life Insurance Co.

/s/ Peter LeBlanc
James J. Ciapciak #552328
Peter LeBlanc #645305
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Respectfully submitted,
For the Plaintiff,

/s/ Brian Keane
David B. Kaplan #258540
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Respectfully submitted,
For the defendants, Michael B. Latti,
Latti Associates and Latti &
Anderson, LLP

/s/ John DeWick
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John DeWick, #654723
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Respectfully submitted,
For the defendant, Morgan
Stanley DW, Inc.

/s/ Sandra Sue McQuay
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was filed via the ECF system and will be served electronically through that system upon Counsel of Record on May 12, 2006.

/s/ Peter LeBlanc
Peter LeBlanc